

**To:** Jonathan.Koplos@cadmusgroup.com[Jonathan.Koplos@cadmusgroup.com]  
**From:** Rao, Kate  
**Sent:** Wed 1/4/2017 7:06:55 PM  
**Subject:** FW: Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit Comments on the Excelsior Mining Arizona Gunnison Copper Project 6-8-20....docx  
EPA letter re Gunnison Copper Project Oct 2016.pdf

Hey Jonathan.

Written summary of calls should be noted under Task 5. See below for TDM. Is this what you were referring to in your previous email?

Also, did you submit an October 2016 progress report to EPA HQ?

Thanks. Kate

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Kate Rao  
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**From:** Rao, Kate  
**Sent:** Wednesday, November 02, 2016 10:19 AM  
**To:** Jonathan.Koplos@cadmusgroup.com  
**Cc:** JAMES D WALKER <Ex. 6 - Personal Privacy>; Albright, David <Albright.David@epa.gov>; Rumrill, Nancy <Rumrill.Nancy@epa.gov>  
**Subject:** Technical Direction Memo: Contract No. EP-C-15-022, WA 1-90; Task 4 (Project Technical Reviews) & Task 5 (Consultation) -- Excelsior Mining Company - Class III UIC Permit

Hi Jonathan – below is a new work initiation request under Contract No. EP-C-15-022, WA 1-90 for Excelsior. Please let me know if you have any questions. You have already confirmed that Jim will work on this project so I am cc'ing him on this email.

Nancy is the tech lead on this project and she will cc: you and me on all call logistics and tech review items.

See Task 5, section a. for info on upcoming call. I am still working out the logistics and will update you when I get more information.

Thanks. Kate

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**Contract No. EP-C-15-022, Workplan Assignment No. 1-90**

**R9 Tech Support for Implementation of the UIC Program – Excelsior Mining Company - Class III UIC Permit #R9UIC-AZ1-FY-16-1**

**Task 4 (Project Technical Reviews) & Task 5 (Consultation)**

**Technical Direction**

**Background:** Excelsior Mining Company (Excelsior) has submitted a UIC area permit application to operate a Class III ISR copper mining facility in Chochise County, AZ.

On 3/24/2016, we issued a TDM requesting a technical review of Excelsior's Class III permit application. Cadmus submitted technical review comments on 6/8/2016 (see attached: Comments on the Excelsior Mining Arizona Gunnison Copper Project\_6-8-2016.docx). EPA utilized these comments to issue the attached Notice of Deficiency on 10/14/2016 to Excelsior. Excelsior has requested a conference call with EPA Region 9 to discuss the NOD.

**Under Task 5 (Consultation),** the contractor shall make available a staff person to consult, directly with EPA staff and/or on calls with EPA & applicant, on the Excelsior Class III permit application and supporting material.

- o Material: Will be sent prior to call or discussed on call.

- o Estimated LOE: Ex. 4 - CBI per call (includes prep time)
  - o Deliverable: Summary of consultation support -- noted in monthly progress report and if possible, within 5 working days of the conference call, send draft notes to EPA via email.
- a. Call scheduled for Tuesday, November 8<sup>th</sup> from 8:30 am to 11:00 am. Pre-discussion and de-brief discussion may be requested (TBD) and will be organized by Nancy Rumrill as needed.
- [redacted] Material to review: 6/8/2016 Cadmus comments and 10/14/2016 NOD.
  - [redacted] LOE: Ex. 4 - CBI (includes prep and calls)
  - [redacted] Deliverable: written summary of consultation provided on call.

**Under Task 4 (Project Technical Review)**, the contractor shall provide technical review for revised/updated Excelsior Class III permit documentation and supporting material. The contractor shall incorporate any comments from EPA and shall provide a final draft to the EPA WACOR.

- o Material: same as under Consultation Task and additional material as provided by the applicant.
- o Estimated LOE: Ex. 4 - CBI per review.
- o Deliverable: Prepare written comments in a format agreed upon when tech review is requested.
- o Schedule: 1 – 2 weeks for each request unless noted otherwise.

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